

**A. Claim 21**

Claim 21 recites, “wherein landmarks are extracted from said map of said geographic information system and said shot image respectively, and the corresponding landmarks are compared, whereby a parameter for use in computing a photographic area of the ground surface having been shot is compensated, and a shot image is displayed being superposed with high precision on said map of the geographic information system.”

The Examiner acknowledges that Lahn fails to disclose the above feature, but contends that the newly cited Yamaguchi reference does. As an initial matter, Applicant notes that rather than superposing a shot image on a map, Yamaguchi teaches superposing features of a map onto a shot image (para. [0024]).

Furthermore, Yamaguchi discloses that map information, such as city names, boundary lines, rivers, etc., that lie within the computed viewpoint are acquired for superposing on the shot image (para. [0038]-[0041]). Applicant submits, however, that all items or specified items within the computed viewpoint are superposed on the shot image without any comparison of landmarks that may still be viewable in the shot image. The invention of Yamaguchi appears to be provided so that if a newscaster is showing video of a disaster area, the newscaster can easily determine what area is being viewed. Applicant submits that Yamaguchi fails to teach or suggest the claimed “comparison” of landmarks as recited in claim 21. In particular, there is no teaching or suggestion in Yamaguchi about extracting a specific landmark in the shot image and comparing it with a corresponding landmark from a map to superpose the shot image with high precision on the map. Rather, any landmarks in Yamaguchi appear to be determined merely due to the computer viewpoint (i.e., items of interest that lie within the computer viewpoint) and such

landmarks are superposed on the shot image without the claimed comparison, compensation and high precision as recited in claim 21.

At least based on the foregoing, Applicant submits that Yamaguchi fails to cure the deficient teachings of Lahn.

**B. Claim 22**

Since claim 22 recites features that are analogous to the features discussed above for claim 21, Applicant submits that claim 22 is patentable for at least analogous reasons as claim 21.

**C. Claims 23-28**

Applicant submits that claims 23-28 are patentable at least by virtue of their dependency upon claim 21 or claim 22.

**D. Claims 29 and 30**

Since claims 29 and 30 recite features that are analogous to the features discussed above for claim 21, Applicant submits that claims 29 and 30 are patentable for at least analogous reasons as claim 21. In particular, both of claims 29 and 30 recite the landmark comparison.

**E. Claims 32-39**

Applicant submits that claims 32-39 are patentable at least by virtue of their dependency upon claim 30.

## II. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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